

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 05CV10558

THOMAS V. MCCAFFERTY,
as father and next of friend of
BRYNN S. MCCAFFERTY, a minor,
Plaintiff,

v.

LOWE'S HOME CENTERS, INC.,
Defendant.

**INITIAL DISCLOSURES OF THE DEFENDANT, LOWE'S HOME CENTERS, INC.,
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), the defendant, Lowe's Home Centers, Inc. ("Lowe's"), makes the following initial disclosures:

A. Individuals believed to have discoverable information

1. Neal Mynahan, 1360 South Washington Street, North Attleboro, MA, (508) 643-1044, subject of information: general store policies and procedures; and
2. Connie Fagerberg, 1360 South Washington Street, North Attleboro, MA, (508) 643-1044, subject of information: allegations set forth in the plaintiff's Complaint.

B. Documents that may support claims or defenses

Lowe's will provide copies of its store policies pertaining to safety and maintenance of its premises.

C. Computations of damages

Not applicable.

D. Insurance Agreement

Lowe's will make available for inspection and copying any insurance policy providing coverage on the date of the alleged incident set forth in the plaintiff's Complaint.

Respectfully Submitted By,

Counsel for Defendant,
Lowe's Home Centers, Inc.

/s/ Jacy L. Wilson

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CERTIFICATE OF SERVICE

I hereby certify that this document has been served upon all counsel of record in compliance with the Federal Rules of Civil Procedure.

/s/ Jacy L. Wilson

Jacy L. Wilson, Esquire

Dated: April 19, 2005